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January 24, 2022

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: United States of America v. Navarro et al., 20 Cr. 160 (MKV)

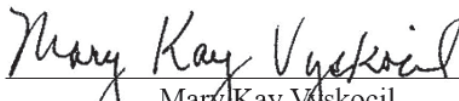
Dear Judge Vyskocil:

I represent Jason Servis in the above-referenced matter and write to respectfully request a 30-day extension for defendants Erica Garcia, Michael Tannuzzo, Jason Servis, and Alexander Chan to file motions for severance, if any such motions are filed. The current severance motion deadline is January 31, 2022. We make this motion because we need (1) additional time to review recent discovery that pertains to the decision to file a severance motion, particularly the recently produced image of the Tannuzzo phone;¹ and (2) Mr. Baum's input, counsel for Mr. Chan, who is in trial for the next few weeks on the Michael Avenatti matter.

Accordingly, we request the severance motion schedule be revised as follows: (1) any defense motions for severance be filed by March 2, 2022; (2) any opposition by the Government be filed by March 16, 2022; and (3) the defense reply brief be filed by March 23, 2022. The Government consents to this request.

Granted. SO ORDERED.

Date: Jan. 27, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge

Sincerely yours,

/s/
Rita M. Glavin

Cc. AUSA Andrew Adams (by email and ECF)

¹ I note that I have had some difficulty accessing the image of the Tannuzzo phone and will work with the discovery coordinator on this issue.